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Attorneys for Defendants

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

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LEGAL BAY LLC, :
Plaintiff, : Case No. 2:22-cv-03941-ES-JBC
- against - :
MUSTANG FUNDING, LLC, MUSTANG : Removed from the Superior Court
SPECIALTY FUNDING I, LLC, : of the State of New Jersey, Essex
MUSTANG SPECIALTY FUNDING II, : County – Chancery Division,
LLC, JAMES BELTZ, and KEVIN : Docket No. (ESX-C-000086-22)
CAVANAUGH, :
Defendants. : Motion Day: August 15, 2022
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NOTICE OF DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE THAT on August 15, 2022, at 9:00 a.m., pursuant to this Court's Motion Calendar, or as soon thereafter as counsel may be heard, the undersigned counsel for Defendants Mustang Funding, LLC, Mustang Specialty Funding I, LLC, and Mustang Specialty Funding II, LLC, James Beltz, and Kevin Cavanaugh, shall move this Court, before the Honorable Esther Salas, United States District Judge for the District of New Jersey, at the Martin Luther King

Building & U.S. Courthouse, 50 Walnut Street Room 4015, Newark, New Jersey 07101, for an Order dismissing all causes of action asserted against Defendants in Plaintiff's complaint, dated May 16, 2022, pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(6), and 9(b).

PLEASE TAKE FURTHER NOTICE THAT in support of this motion, Defendants shall rely on the accompanying memorandum of law in support of their motion to dismiss the complaint and the declaration of Christian T. Becker with exhibits annexed thereto.

PLEASE TAKE FURTHER NOTICE THAT a proposed form of Order granting Defendants' motion is enclosed herewith.

Dated: July 22, 2022
New York, New York

KASOWITZ BENSON TORRES LLP

By: /s/ Christian T. Becker
Christian T. Becker
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forthcoming)
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